

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

PAMELA G. CAPPETTA)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:08cv288
)	
GC SERVICES, LP)	
)	
Defendant.)	

LYNN LESTYK)	
BASIL LESTYK)	
on behalf of themselves and)	
those similarly situated)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:09cv598
)	
GC SERVICES, LP,)	
)	
Defendant.)	

JAMES THOMAS, on behalf of himself)	
and those similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:09cv597
)	
GC SERVICES, LP,)	
)	
Defendant.)	

DECLARATION OF MATTHEW J. ERAUSQUIN

I, Matthew J. Erausquin, an adult individual, depose upon my oath and declare the following to be true and correct:




I am a member in good standing of the Virginia State Bar. I have personal knowledge of the matters set forth herein, and could and would testify competently thereto if called upon to do so.

1. I am one of the attorneys working on behalf of the named Plaintiffs and the putative class members in the above styled litigation.

2. I have personal knowledge that our firm advanced the expenses set forth in Exhibit A to this Declaration on behalf of the named Plaintiffs and the putative class members while litigating this case in an aggregate amount of \$51,653.74.

3. Each of the costs reflected in Exhibit A was incurred for goods and services that were necessary for the litigation of the case. The chart reflects a payment to Binary Star Development in the amount of \$20,783.27. Binary Star Development is a consulting firm that specializes in mainframe database systems. It provided valuable expert assistance to Plaintiffs' counsel in its conduction of the site inspection at the Defendant's headquarters, as well as the provision of testimony to the Court by affidavit describing the capabilities of the Defendant's computer systems. The majority of the remainder of the amounts expended were paid to court reporters for copies of transcripts and video depositions conducted in this case, or to JAMS for mediation services provided in this matter.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was signed in Alexandria, Virginia, on April 15, 2011.


Matthew J. Erasquin

Unbilled Costs

Source Name	Paid Amount
Federal Express	11.90
Federal Express	12.39
The Marston Agency	75.00
The Marston Agency	150.00
The Marston Agency	11.00
United Air	650.99
Federal Express	114.03
United States District Court	26.00
Casale Reporting Service	510.00
United Air	154.00
United Air	154.00
Peter Henke	57.70
Federal Express	4.64
Postnet	15.34
Federal Express	13.88
Federal Express	9.74
Federal Express	11.94
Federal Express	16.97
Halasz Reporting	622.20
Federal Express	8.96
Federal Express	16.03
Federal Express	8.81
American Express / DATAMARK	64.90
Federal Express	11.28
Federal Express	11.28
Federal Express	14.20
Federal Express	9.91
Federal Express	13.26
Federal Express	13.26
Williamsburg Circuit Court	13.00
Federal Express	11.41
Federal Express	13.57
Federal Express	11.41
Federal Express	17.37
Federal Express	13.57
Federal Express	8.42
Kinko's	19.50
United States District Court	26.00
United States District Court	26.00
Capital Reporting Company	690.80
Federal Express	15.27
Free Conference	70.97
Kinko's	3.80
Dunn and Bradstreet	59.99
Capital Reporting Company	577.50
Federal Express	13.74

Unbilled Costs

Source Name	Paid Amount
Federal Express	7.53
Federal Express	11.87
Federal Express	16.82
Federal Express	10.21
Federal Express	10.21
Federal Express	10.59
Federal Express	7.53
Federal Express	7.53
Federal Express	10.21
Federal Express	7.53
Federal Express	10.59
Casale Reporting Service	290.00
National Processing Center, LLC	60.00
The Marston Agency	75.00
LoneStar Delivery	109.00
Federal Express	14.76
Federal Express	35.86
Federal Express	7.16
Federal Express	15.10
Federal Express	12.52
Federal Express	19.70
Houston Reporting Service	395.56
Casale Reporting Service	1,538.80
Paulson Reporting & Litigation Services	2,366.30
Houston Reporting Service	749.72
Federal Express	9.44
Anita B. Glover & Associates, Ltd.	258.50
Federal Express	9.32
Federal Express	9.44
Federal Express	9.44
Federal Express	6.69
The Marston Agency	75.00
Postnet	26.35
Federal Express	6.69
Federal Express	12.39
Federal Express	6.79
Federal Express	12.83
Kinko's	67.52
Federal Express	7.53
Federal Express	6.66
Sav-On Process Service	85.00
Federal Express	6.62
Federal Express	12.09
Federal Express	9.69
Federal Express	14.05
Postnet	2.61
Federal Express	9.69

Consumer Litigation Associates**Unbilled Costs**

Source Name	Paid Amount
Jeffrey B. Kull	23.40
Federal Express	14.19
Houston Reporting Service	492.20
PohlmanUSA Court Reporting	141.00
PohlmanUSA Court Reporting	233.00
PohlmanUSA Court Reporting	313.50
PohlmanUSA Court Reporting	478.00
PohlmanUSA Court Reporting	508.50
PohlmanUSA Court Reporting	464.00
PohlmanUSA Court Reporting	305.88
PohlmanUSA Court Reporting	351.50
PohlmanUSA Court Reporting	607.75
PohlmanUSA Court Reporting	409.00
Houston Reporting Service	284.26
Federal Express	6.76
Trial Solutions of Texas, LLC	353.87
Federal Express	6.73
Federal Express	13.83
Federal Express	14.07
Federal Express	8.00
Federal Express	11.37
Federal Express	6.90
The Marston Agency	11.00
United States District Court	52.00
Postnet	96.33
Postnet	2.78
Free Conference	24.17
Free Conference	118.78
Federal Express	9.58
Federal Express	29.49
Federal Express	25.66
Federal Express	13.83
Federal Express	31.09
United States District Court	26.00
Federal Express	12.39
Federal Express	14.40
Federal Express	13.70
Federal Express	14.96
Federal Express	7.65
Trial Solutions of Texas, LLC	1,617.31
Maxene Weinberg Agency	465.50
Maxene Weinberg Agency	460.00
Dunn and Bradstreet	149.00
Federal Express	227.08
Federal Express	19.10
Federal Express	14.82
Jeffrey B. Kull	36.00

Consumer Litigation Associates**Unbilled Costs**

Source Name	Paid Amount
Federal Express	12.52
Federal Express	18.14
Postnet	20.99
Jeffrey B. Kull	14.40
Federal Express	7.17
Federal Express	7.17
Federal Express	21.47
Federal Express	19.19
Federal Express	11.89
Federal Express	21.69
Richmond Parking	23.00
Federal Express	21.08
Federal Express	13.58
Federal Express	20.10
Federal Express	10.84
Federal Express	7.40
Federal Express	11.80
Federal Express	15.43
Federal Express	13.59
Federal Express	13.59
Federal Express	10.89
Pro Hac App	50.00
Binary Star Development	20,783.27
Federal Express	183.47
JAMS	4,765.14
Williams Mullen	2,454.00
Casale Reporting Service	2,751.90
City of Richmond	30.00
United States District Court	350.00
Federal Express	15.32
The Marston Agency	75.00
Federal Express	12.00
Federal Express	7.23
United States District Court	350.00
Federal Express	15.33
The Marston Agency	75.00
Federal Express	12.00
Federal Express	10.01
Federal Express	7.44
TOTAL	51,653.74